



**United States Environmental Protection Agency
J&W Pallet and Drum Site
Pollution Report (POLREP) #2 and Final**

Date: September 15, 2006

From: Karen Buerki
On-Scene Coordinator
U.S. EPA Region 4

To: Site File
Mary Smiley, GA EPD
Susan Hansen, EAD
Regional Response Center (for distribution)

I. GENERAL SITE INFORMATION

Site Name and Location: J&W Pallet and Drum
1121 Allene Avenue
Atlanta, Fulton County, Georgia 30310

Dates Covered: June 26, 2004 through May 18, 2005

Start Date: June 22, 2004

Completion Date: May 18, 2005

Incident Category:

Inactive Facility, Drum Recycler
Non-NPL, Fund Lead, Time-Critical Removal Action
Site ID No.: A4FG

Response Authority: CERCLA
ERNS No.: NRC #725818
Task Order (TO) No.: 0206-F4-0020
TO Ceiling: \$200,000 - June 22, 2004
\$235,000 - April 4, 2005

CERCLIS ID No.: GAD984310797
State Notification: GA EPD
Site Ceiling: \$315,000 - April 4, 2005

II. BACKGROUND INFORMATION

When the facility was operational, it was used for drum recycling. The warehouse was full of drums and containers with residual hazardous waste in them. The roof had collapsed and the yard was overgrown with kudzu, making the exact contents of the warehouse and property difficult to ascertain. The facility had not been operational as a permitted business since 2002, however, soil staining, factory seals, container labels, tote placards on the ground outside the front door and inside the



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warehouse, with dates as recent as April 2004, indicate unauthorized drum recycling had occurred. Liquid waste had accumulated on the floor and was discharging through the mortar of a blocked-up doorway and out into the street.

On June 22, 2004, Karen Buerki, On-Scene Coordinator (OSC), was dispatched to 1121 Allene Avenue at the request of the Atlanta Fire Department to investigate a discharge of unknown liquid to a storm drain. A removal site evaluation in accordance with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 CFR Part 300.410, determined that there was a threat to public health or welfare or the environment posed by the presence of approximately 3,000 drums and various containers labeled or hazard categorized as flammable, corrosive, oxidizer, listed hazardous waste, or poison liquids contained in and around a dilapidated warehouse, corroded and unsecured acetylene cylinders, and a discharge of unknown chemicals to a near-by storm drain from the J&W Pallet and Drum Co. Based on the removal site evaluation, the OSC determined that the Site meets the criteria for initiating a Removal Action under Section 300.415 of the NCP. As a result of Site conditions, immediate action pursuant to Section 104 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), was necessary at the Site.

III. RESPONSE INFORMATION

A. Actions Taken

1. Current Situation

a. ERRS contractor WRSIE completed disposal activities on May 18, 2005.

b. Resources used on-site:

EPA (1), START II (1-4), ERRS (5)

WRSIE crew consisted of a Project Manager, two Equipment Operators, and three Technicians. START-2 contractor provided site assessment, hazcatting, site documentation, and confirmation sampling.

c. Weather conditions were generally hot with occasional thunderstorms.

2. Response Actions

a. ERRS provided fencing for site security and conducted demolition of fallen sections of roofing to provide a safe work area.

b. ERRS cleared the property, bulked wastes, excavated contaminated soil, disposed of RCRA-empty drums and totes, and provided for disposal of wastes and contaminated soil.

c. ERRS cleaned out the warehouse and restored the drain to the City of Atlanta sewer system.

B. Use of Innovative Technologies

None

C. Community Involvement

Fact Sheets were distributed within the surrounding neighborhood. CIC Sherryl Carbonaro contacted Councilwoman Clea Winslow and Mayor Shirley Franklin's office.

D. Unusual Circumstances

None

E. Future Considerations

None

F. Post Removal Site Controls

None

IV. CONTRACTOR INFORMATION AND ESTIMATED COSTS (through April 4, 2006)

Extramural		<u>Ceiling</u>	<u>Cost to Date</u>	<u>% Remaining</u>
ERRS (WRSIE)	TO #0206-F4-0020	\$235,000.00	\$224,481.20	4.5%
START-2 ¹ (TTEMI)	TDD #4T-04-06-A-007	\$45,000.00	\$44,573.33	1%
START-2 (TTEMI)	TDD #4T-04-06-B-005	\$65,000.00	\$57,100.00	12%
	Total Extramural	\$345,000.00	\$326,154.53	
Intramural	EPA Costs		\$5,000	
	Total Intramural		\$5,000	
SITE TOTAL		\$345,000.00	\$331,154.53	

¹ Removal Assessment TDD not applied to the site ceiling

V. DISPOSITION OF WASTES

Seventeen waste streams were identified. Amounts reflect actual amounts removed off-site, cumulative to the end of the period covered by this POLREP.

Wastestream	Amount	Waste Code	Location /Vendor
C&D Debris	184.71 Tons	None	Waste Management Pine Bluff Landfill Ball Ground, GA
Subtitle D, Non-Hazardous, Non-Regulated Soils	20.90 Tons	None	Pine Ridge Landfill Griffin, GA
RCRA-Empty Containers	2,022	None	Greenleaf Treatment Services Macon, GA
Hydrofluoric Acid Drums	27	U134	C-MAC Environmental Group Glencoe, AL
Listed Waste Drum	1	F006	C-MAC Environmental Group Glencoe, AL
Aqueous Liquids	8,207 Gallons	None	EQ of Augusta Augusta, GA
High BTU Liquids-Organic	5 Drums	None	EQ North Carolina Apex, NC
Low BTU Liquids-Organic	1 Drum	None	EQ Industrial Services Atlanta, GA
Sludges	18 Drums	None	EQ Industrial Services Atlanta, GA
Solids	4 Drums	None	EQ Industrial Services Atlanta, GA
Flammable Organic Liquids	2 Drum	D001, D007, D008	EQ North Carolina Apex, NC
Flammable Organic Sludges	1 Drum	D001	EQ North Carolina Apex, NC
Hazardous Waste Organic Liquids	1 Drum	D018	EQ North Carolina Apex, NC
Hazardous Waste Aqueous Liquids	4 Drums	D007	EQ North Carolina Apex, NC
Acidic Liquids	5 Drums	D002, D007	EQ North Carolina Apex, NC

Caustic Liquids	3 Drums	D002	EQ North Carolina Apex, NC
PCB Ballasts	1 Drum	None	Wayne Disposal, Inc. Belleville, MI
Recycle Groups	Amount	Waste Code	Location /Vendor
Mercury-containing Lights	260	Universal Waste	AERC, Inc West Melbourne, FL
Tires	115	None	RTG of Georgia Atlanta, GA
Auto Batteries	12	None	
Acetylene Cylinders	9	None	Linde Gas BOC Gas (2)
Oxygen Cylinders	9	None	Linde Gas BOC Gas (1)

VI. ROSTER OF AGENCIES/ORGANIZATIONS ASSISTING IN REMOVAL

Organization/Agency	Primary Contact	Phone Number	Role/Activity
U.S. EPA Region 4	Karen Buerki Jose Negron Sherryl Carbonaro	404-562-8747 404-562-8754 404-562-8611	OSC OSC CIC
WRSIE	Greg Garrison Mike Ingle	813-684-4400	Project Manager
TTEMI	Neal Daniel John Schendel Charlie Parker		Project Manager
GAEPD	Mary Smiley	404-656-6905	State Responder
PRP	J. Mercer Brown	404-771-4939	Property Owner
PRP	Jesse James Woods, Jr. Anthony Tyrone Jones		Business Owners
City of Atlanta	Robert Coleman	404-624-0751	Wastewater Treatment and Collection

City of Atlanta Fire Department	Michael Williams, Assistant Chief	404-658-7412	First Responder
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Please be advised that statements in this document concerning the status of response activities are intended solely for use by employees of the United States Environmental Protection Agency for management of the Superfund removal program and are not intended for use in calculating cost recovery statutes of limitations. Moreover, EPA may continue to evaluate this site to determine the necessity of additional response actions.